IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of ~~~~~~~~~~~ Art Group: 2612 Hall, David R., et al Examiner: Wong, Albert Kang Serial No.: 10/710,825 Filed: August 5, 2004 Docket No.: 66.0069

For: Swivel Assembly

December 12, 2006

Honorable Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Dear Sir:

This paper is timely submitted in response to the Patent and Trademark Office Action mailed August 30, 2006 for which the shortened - statutory period for response - plus a one-month extension for time - is set to expire on December 30, 2006. Reconsideration of the application in view of the following amendments and remarks is respectfully requested.

AMENDMENT

Please amend the above-identified application as follows: